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UNITED STATES BANKRUPTCY COURT

DISTRICT OF OREGON

In re:

PACIFIC CONSTRUCTION GROUP, LLC,

Debtor.

Case No. 19-31770-pcm11

MOTION TO EXTEND TIME TO FILE
MISSING DOCUMENTS

Pacific Construction Group, LLC (the “Debtor”), hereby moves this Court for the entry of an Order extending the deadline by which Debtor’s missing documents are due. In support of the motion, Debtor asserts the following:

1. Debtor and counsel have been diligently working on preparing and finalizing the missing documents.
2. Debtor has been unable to review or sign amended petitions or schedules, as Elizabeth Mackenzie, the Debtor’s principal that is most familiar with the Debtor’s books and records, was required to travel to be a witness in a lawsuit being tried in California.
3. Debtor’s principals expect to meet with counsel in the near future, to review and sign the missing documents. Debtor’s principals expect to meet with counsel no later than June 3, 2019.

WHEREFORE, the Debtor prays for the Court to enter an Order extending the deadline by which the Debtor's missing documents must be filed, from May 28, 2019, to June 3, 2019.

DATED May 28, 2019, 2018.

MOTSCHENBACHER & BLATTNER, LLP

/s/ Nicholas J. Henderson
Nicholas J. Henderson, OSB #074027
Of Attorneys for Debtor in Possession